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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

This Document Relates to:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

**STIPULATION AND ~~PROPOSED~~ ORDER  
CONCERNING PROCEDURE FOR META'S  
PRIVILEGE OBJECTIONS TO THE  
TRANSCRIPT OF DEPOSITION OF JASON  
SATTIZAHN**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

1 The MDL Personal Injury and School District Plaintiffs and MDL State Attorneys General  
 2 (collectively, “Plaintiffs” or “MDL Plaintiffs”) and Defendants Meta Platforms, Inc. f/k/a Facebook, Inc.;  
 3 Facebook Holdings, LLC; Facebook Operations, LLC; Meta Payments Inc. f/k/a Facebook Payments Inc.;  
 4 Meta Platforms Technologies, LLC f/k/a Facebook Technologies, LLC; Instagram, LLC; and Siculus LLC  
 5 f/k/a Siculus, Inc. (collectively, “Meta”) respectfully submit this Stipulation and Proposed Order:

6 WHEREAS the deposition of Dr. Jason Sattizahn was taken on December 8, 2025.

7 WHEREAS that deposition was originally ordered to go forward by the New Mexico Santa Fe  
 8 County First Judicial District Court in the matter *State of New Mexico ex. rel. Torrez v. Meta Platforms,*  
 9 *Inc.*, No. D-101-CV-2023-02838 (the New Mexico matter) on the terms set forth in the New Mexico court’s  
 10 Order Concerning Conduct of Deposition of Jason Sattizahn (attached hereto as Exhibit 1 and incorporated  
 11 by reference herein), but was eventually noticed to occur in a number of additional matters, including this  
 12 one.<sup>1</sup>

13 WHEREAS the final transcript of Dr. Sattizahn’s deposition (the Sealed Sattizahn Transcript)  
 14 became available on December 15, 2025.

15 WHEREAS under order from the court in the New Mexico matter, Meta’s privilege objections to  
 16 portions of the Sealed Sattizahn Transcript are due on December 26, 2025.

17 WHEREAS Meta’s privilege objections in the New Mexico matter will quote from material in the  
 18 Sealed Sattizahn Transcript over which Meta is asserting attorney-client privilege and/or work product  
 19 protection. Meta will therefore submit those privilege objections to the New Mexico court *in camera*, with  
 20 copies served on New Mexico, subject to New Mexico’s agreement, consistent with the terms of the Orders  
 21 contained in Exhibits 1 and 2, that such sharing does not constitute a waiver of Meta’s privilege.

22 WHEREAS Meta has agreed to also serve copies of its New Mexico privilege objections on  
 23 Plaintiffs subject to Plaintiffs’ agreement (consistent with the terms of the Orders contained in Exhibits 1

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24 <sup>1</sup> This deposition was attended by Plaintiffs pursuant to the terms of the Order Resolving Joint Letter Brief  
 25 Regarding Disputes Over Privilege Issues in Connection with the Deposition of Jason Sattizahn (ECF 2523)  
 26 as well as the Offices of the Attorneys General for the State of Vermont, New Hampshire, Oklahoma, and  
 27 the District of Columbia, and the Utah Division of Consumer Protection. The deposition was attended by  
 28 MDL and JCCP Plaintiffs; and the Offices of the Attorneys General for the States of Arkansas, Florida,  
 Massachusetts, New Mexico, Oklahoma, Tennessee, the District of Columbia, New Hampshire, Vermont,  
 and Utah pursuant to the terms of the Amended Stipulated Order Concerning the Deposition of Jason  
 Sattizahn entered December 5, 2025 in the New Mexico matter (New Mexico Stipulated Order), attached  
 hereto as Exhibit 2 and incorporated by reference herein.

and 2 and ECF 2523) that such sharing does not constitute a waiver of Meta’s privilege and that those objections may not be disclosed or shared outside of the New Mexico matter, *except and only* (1) to the extent necessary to resolve privilege disputes with respect to the Sealed Sattizahn Transcript in the above-captioned proceeding and (2) to the extent Plaintiffs agree and this Court expressly allows and/or orders Meta’s New Mexico privilege objections to be submitted for *in camera* review. Otherwise, no version of or excerpts from Meta’s privilege objections may be disclosed or shared outside of the New Mexico proceeding.

WHEREAS to the extent the New Mexico court sustains Meta’s privilege objections and Plaintiffs elect not to contest any portion of the New Mexico court’s rulings within 30 days thereafter—or to the extent Plaintiffs contest any privilege rulings by the New Mexico court and this Court affirms those findings (i.e., sustains Meta’s privilege objections)—then the portions of Dr. Sattizahn’s deposition transcript or exhibits containing the privileged material shall be stricken, and Plaintiffs shall destroy all copies of the original deposition transcript and exhibits (including to the extent contained in Meta’s New Mexico privilege objections) and replace them with versions that redact the privileged material.

THEREFORE:

1. Plaintiffs and Meta agree to the paragraphs set forth above;
2. Meta shall serve copies of its New Mexico privilege objections on Plaintiffs promptly after serving those privilege objections on New Mexico;
3. Meta’s sharing of its New Mexico privilege objections with Plaintiffs does not, consistent with the terms of the Orders contained in Exhibits 1 and 2, constitute a waiver of Meta’s privilege; and
4. Meta’s New Mexico privilege objections SHALL NOT be disclosed or shared outside of the New Mexico matter, consistent with the terms of the sixth “WHEREAS” clause above.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: December 31, 2025

  
Honorable Peter H. Kang  
U.S. Magistrate Judge

1 Dated: December 30, 2025

Respectfully submitted,

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**ATTESTATION**

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: December 30, 2025

By: /s/ Lexi J. Hazam